

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION

JUDICIAL WATCH, INC.,

Plaintiff,

v.

COMMONWEALTH of
PENNSYLVANIA, et al.,

Defendants.

Civ. Action No. 1:20-cv-00708-CCC

**PLAINTIFF'S UNOPPOSED MOTION FOR TWO-WEEK
EXTENSION OF TIME TO RESPOND TO THE COUNTY
DEFENDANTS' MOTION TO DISMISS**

Plaintiff Judicial Watch, Inc. ("Plaintiff") respectfully submits this unopposed motion for a two-week extension of its time to respond to the motion by the named defendants of Bucks, Chester, and Delaware Counties (the "County Defendants") to dismiss the complaint. (ECF No. 35.)

1. County Defendants' motion to dismiss was filed July 10, 2020. Plaintiff currently has until July 24, 2020 to respond to that motion.
2. County Defendants **do not oppose** a two-week extension of Plaintiff's time to respond to the motion to dismiss, to August 7, 2020.
3. Mr. Popper, lead counsel for Plaintiff, was on vacation until this past Monday, July 13, 2020, and Mr. Lee, co-counsel for Plaintiff, was on vacation until

this past Thursday, July 16, 2020.

4. Counsel for the parties held a case management conference this week, and plan to file a joint case management plan next week, as required by local rules and by this Court's case management order. (ECF No. 27.) Counsel are also preparing their initial disclosures. In addition to their obligations in this case, Plaintiff's counsel has a number of current obligations in other cases, including preparing a motion to amend the complaint and responding to dispositive motion practice that is expected to be filed within a few days.

As a result, Plaintiff respectfully submits that good cause supports a two-week extension of its time to respond to County Defendants' motion to dismiss, to August 7, 2020.

Dated: July 17, 2020

Respectfully submitted,

/s/ Shawn M. Rodgers

Shawn M. Rodgers, Esq.
Jonathan S. Goldstein, Esq.**
GOLDSTEIN LAW PARTNERS, LLC
11 Church Road
Hatfield, Pennsylvania 19440
[srodders@goldsteinlp.com](mailto:sroddgers@goldsteinlp.com)
jgoldstein@goldsteinlp.com
(610) 949-0444

Robert D. Popper*
Eric Lee*
JUDICIAL WATCH, INC.
425 Third Street SW, Suite 800
Washington, D.C. 20024
(202) 646-5172

Rpopper@judicialwatch.org
Elee@judicialwatch.org

T. Russell Nobile*
JUDICIAL WATCH, INC.
Post Office Box 6592
Gulfport, Mississippi 39506
(202) 527-9866
Rnobile@judicialwatch.org

H. Christopher Coates**
LAW OFFICE OF H. CHRISTOPHER COATES
934 Compass Point
Charleston, South Carolina 29412
(843) 609-7080
currieocoates@gmail.com

* *Admitted pro hac vice*

** *Application for admission pro
hac vice forthcoming*

CERTIFICATE OF SERVICE

I certify that the foregoing motion for a two-week extension was filed electronically and served on counsel of record via the ECF system of the U.S. District Court for the Middle District of Pennsylvania.

July 17, 2020

/s Shawn M. Rodgers
Shawn M. Rodgers